

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AKANUYENG WILLIAM ETUK

Write the full name of each plaintiff.

24 CV 04989

(Include case number if one has been assigned)

-against-

CITY OF NEW YORK

COMPLAINT

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED
SDNY PRO SE OFFICE
2024 AUG 16 PM 1:01

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

SEE ATTACHED

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, AKANIXENE WILLIAM GUNF is a citizen of the State of
(Plaintiff's name)

NEW YORK
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If the defendant is a corporation:

The defendant, CITY OF NEW YORK, is incorporated under the laws of the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>AKANIYENE</u>	<u>W</u>	<u>ETUK</u>
First Name	Middle Initial	Last Name
<u>2402 ATLANTIC AVENUE #04</u>		
Street Address		
<u>BROOKLYN</u>	<u>NY</u>	<u>11233</u>
County, City	State	Zip Code
<u>929 676 0970</u>		
Telephone Number	Email Address (if available)	

United State District Court

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

Akaniyene William Etuk

2402 Atlantic Avenue #04

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 /1(929) 676-0970

Pro Se Plaintiff

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Akaniyene William Etuk,

Plaintiff,

v.

~~New York City Police Department, et al.,~~ *CITY OF NEW YORK*
Defendants.

Case No.: _____

COMPLAINT

United State District Court

7. Plaintiff, accompanied by a registered service animal providing essential services, was stopped by NYPD officers from the station located at 215 E 161 St., Bronx, NY 10451, without Plaintiff's permission or any contractual basis.
8. NYPD officers forced Plaintiff to identify himself, thereby violating Plaintiff's right to privacy.
9. NYPD officers made several legal determinations without possessing a license to practice law.
10. NYPD officers did not show their identification cards, thus failing to verify themselves as registered policemen.
11. NYPD officers approached Plaintiff with guns, forcing Plaintiff under threat, duress, and coercion to engage with them.
12. NYPD officers issued a summons (Case #Docket number 2023SX005516, Summon number 4446495504) on March 9, 2023, without lawful authority. A copy of the dismissal certificate is attached as Exhibit A.
13. NYPD officers used physical force, causing Plaintiff and his service animal pain, without any lawful contact or justification.
14. NYPD officers transported Plaintiff and his service animal to a location different from his intended point of travel and injected Plaintiff with a substance without consent or contractual agreement.
15. There is no evidence that these NYPD officers did not threaten Plaintiff and hold him at gunpoint to traffic Plaintiff and his service animal without permission or a contract.
16. There is no evidence that these NYPD officers were not working for a foreign corporation or that they were in fact legitimate police officers for the original Republic.

United State District Court

24. Defendants' use of physical force against Plaintiff and his service animal without lawful justification constituted excessive force in violation of the Fourth Amendment.

Count IV: False Imprisonment

25. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

26. Defendants' actions in detaining and transporting Plaintiff and his service animal without lawful justification constituted false imprisonment.

Count V: Violation of the Americans with Disabilities Act (ADA)

27. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

28. Defendants' arrest and detention of Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the ADA.

Count VI: Due Process Violations

29. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

30. Defendants' actions deprived Plaintiff of liberty and property without due process of law, in violation of the Fourteenth Amendment.

Prayer for Relief

United State District Court

Dated: ____ / ____ / ____

Respectfully submitted,

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue #o4

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 /1(929) 676-0970

United State District Court

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

Akaniyene William Etuk

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Pro Se Plaintiff

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United State District Court

Dated: ____ / ____ / ____

Respectfully submitted,

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue #o4

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 /1(929) 676-0970



CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF BRONX
1 CENTRE STREET
NEW YORK, NY 10007

SUMMONS # 4454732904

May 12, 2023

RE: AKANIYENE, ETUK

As of the above referenced date, the DEPARTMENT OF SOCIAL SERVICES has failed to file a legally acceptable accusatory instrument with this court. There is no need for you to return to court on the summons number referenced above.

RETAIN THIS NOTICE FOR YOUR RECORDS

A partir de la fecha referido arriba, el DEPARTMENT OF SOCIAL SERVICES ha fallado en radicar un documento acusatorio legalmente aceptable con este tribunal. No es necesario que usted regrese a la corte con referencia al numero del caso anteriormente indicado.

RETENGA ESTE COMPROBANTE EN SUS ARCHIVOS

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF BRONX
1 CENTRE STREET
NEW YORK, NY 10007

ETUK AKANIYENE
UNDOMICILED

CRJ - 320b (07-17)									
Complaint/Information									
The People of The State of New York vs.									
Name (Last, First, MI)						Date of Birth (mm/dd/yy)			
AKANITENE, ETUK						01/08/1977			
Street Address						Apt No			
3600 Jerome Avenue									
City				State		Zip Code			
Bronx				NY		10467			
Cell Phone Number (Home X for Refused if not provided)						Home Phone Number (Home X for Refused if not provided)			
N/A									
Court Appearance Date (mm/dd/yyyy): (Ensure correct return date is entered) 04/18/2023 at: 9:30 a.m.									
The court appearance location: <input type="radio"/> Other (specify) _____									
<input checked="" type="radio"/> Bronx <input type="radio"/> Kings & New York <input type="radio"/> Madison <input type="radio"/> Red Hook <input type="radio"/> Queens <input type="radio"/> Richmond									
<input type="radio"/> Criminal Court <input type="radio"/> Criminal Court <input type="radio"/> Community Court <input type="radio"/> Community Justice Center <input type="radio"/> Criminal Court <input type="radio"/> Criminal Court									
ID License Number				State		Type Class		Expires (mm/dd/yyyy)	
7192619									
Race		Sex		Ht		Wt		Plate Reg	
<input type="radio"/> White <input type="radio"/> Black <input type="radio"/> Hispanic/Latino <input type="radio"/> Asian/Pacific Islander		<input checked="" type="radio"/> Male <input type="radio"/> Female		M		6'0"		200 lbs	
Reg State		Expires (mm/dd/yyyy)		Plate Type		Veh Type		Color	
The Person Described Above is Charged as Follows:									
Title of Offense: Disorderly Conduct									
Time 24 Hour (hh/mm)				Date of Offense (mm/dd/yyyy)				County	
2117				03/30/23				Bronx	
Place of Occurrence								Precinct	
I/s/o 3600 Jerome Avenue								052	
In Violation of Section		Subsection		Veh		Adm Code		Other	
240.20		(1)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Factual Allegations (describe how the offense was committed, OR complete reverse)									
At +1810 while inside of a NYC Shelter Dept. Was observed by DHPD engaging in a violent physical altercation with other individuals while also refusing to comply with officers commands to release.									
NYPD CODE				ICAD #					
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4									
Defendant stated in my presence (in substance):									
N/A									
I personally observed the commission of the offense charged herein. False statements made herein are punishable as a Class A Misdemeanor pursuant to section 210.45 of the Penal Law. Affirmed under penalty of law.									
Complainant's Full Name Printed				Rank Full Signature of Complainant				Date Affirmed (mm/dd/yyyy)	
A. Garcia				PO. Morris				03/30/2023	
Tax Registry #		Agency		Command Code					
1642645		DHPD		ORIGINAL		097			



AGENCY/POLICE COPY 1



Animal
Care Centers
of NYC

2336 Linden Boulevard
Brooklyn NY 11208
212-788-4000

Vet Treatment History

Owner Details

Akaniyene Etuk
1923 McDonald Avenue APT 167
BROOKLYN NY 11223

818 485 9411
818 485 9411

Animal Details

Name: Vellee
Type: Dog
Mixed: Yes
Color(1): Unknown (update later)
Gender: Female
Spayed / Neutered: Unknown
Age: 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment Type	Date Given	Type	Expiration Date	Route Of Admin	Result Vet	License #
1 Rabies Vaccine	22-Oct-2022	Killed			VET-P 991234	NY-010887

Vet Treatment Type	Due Date
1 Rabies Vaccine	22-Oct-2023

Vet Signature:


Dr. Michelle Lugones

Date: 10/22/2022 1:19:00 PM

[Inbox \(1/189\)](#)
[From: subject](#)
[Track \(USA Service\)](#)
[Gmail](#)
[ChatGPT \(Gpt-4\)](#)
[ChatGPT](#)
[Complaint Filed](#)
[Summary Report](#)
[KINGS](#)
[Mail - Akaiyene](#)

usa.servicedogregistration.com/track/?trackid=1009076684

[SERVICE ANIMAL TYPES](#)
[STORE](#)
[SUPPORT](#)
[REVIEWS](#)

[CALL OR TEXT NOW 782-783-7783](#)
[REGISTRATION LOGINUP](#)
[LOGIN](#)

MY ACCOUNT

Print

HANDLER INFO

Akaiyene Elok
 1923 McDonald Avenue #167, Brooklyn,
 NY, 11223
 Email:
 polyphonicsystems@gmail.com
 Phone: 2135630546

REGISTERED ANIMALS

Animal #1: Vallee
 Breed: Rottweiler
 Type: Service Dog

Handler: Akaiyene Elok
 1923 McDonald Avenue #167,
 Brooklyn, NY, 11223
 polyphonicsystems@gmail.co
 m | 2135630546

Registration: 1009076684
 Service: Medical Alert
 Training Status: My Dog Is
 "Trained Service animal"

I have a pending letter quest...

[How to make my dog servit...](#)

[Forgot my registration no...](#)

1:10 PM 8/16/2024

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

SEE ATTACHED

SEE ATTACHED

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

SEE ATTACHED

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

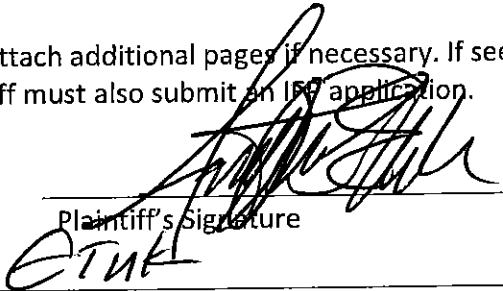
SEE ATTACHED

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an LPO application.

Dated 8/19/2024 Plaintiff's Signature 
 First Name AKANIYENE Middle Initial W Last Name ETUK
 Street Address 2402 ATLANTIC AVE #04
 County, City BROOKLYN State NY Zip Code 11233
 Telephone Number 929 676-0970 Email Address (if available) _____

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Please list all your pending and terminated cases to which you would like this consent to apply. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)

Address

City

State

Zip Code

Telephone Number

E-mail Address

Date

Signature

[Click Here to Save](#)